

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

UNITED STATES OF AMERICA )

v. )

BOB KEITH WATSON )

Nos. 3:01-cr-55;

3:01-cr-71

JUDGE JARVIS

C. Clifford Shirley, Jr.

United States Magistrate Judge

FILED

2006 APR 25 A 10:29

Granted April 24, 2006

C. Clifford Shirley, Jr.

US Magistrate Judge

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**MOTION FOR RELIEF FROM FILING DEADLINE**

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Comes the Defendant, Bob Keith Watson, by undersigned counsel, and respectfully moves the Honorable Court for a one (1) week continuance of the Motion deadline set by counsel and this Court. In support of this Motion, Mr. Watson would state:

1. Counsel was appointed to Bob Keith Watson's case after the return from a mandate from the United States Court of Appeals for the Sixth Circuit on sentencing issues.
2. Counsel has discussed this case with United States Probation Officer John Lynn on multiple occasions.
3. Counsel has reviewed most of the pleadings practice that occurred prior to the conviction and sentencing of Mr. Watson.
4. Counsel is also aware that Mr. Watson has filed multiple *pro se* Motions, including one (1) Motion that is pending. (Motion for Return of Property, ECF Document No. 216-1)

5. Counsel has endeavored to sort out the pleadings in this case and prepare for a re-sentencing of Mr. Bob Watson.
6. Currently, the filing deadline for Mr. Watson is set for April 21, 2006. Counsel respectfully requests ten (10) days up to and including Monday, May 1, 2006 in order to file any and all appropriate pleadings on Mr. Watson's behalf. Counsel hopes that this time will help economize these pleadings, and make whatever issues at the sentencing, if any, minimal.
7. The United States does not appose this Motion. Communications by voicemail with Assistant United States Attorney Jeff Theodore has indicated that the United States does not oppose this Motion. In return, Mr. Watson does not oppose any extension of time in order for the United Sates to respond to any filing of Mr. Watson.

Respectfully submitted this 24<sup>th</sup> day of April, 2006.

ELDRIDGE & GAINES, PLLC

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**CERTIFICATE OF SERVICE**

\_\_\_\_\_I hereby certify that on April 24, 2006, a copy of the foregoing "Motion for Relief of Filing Deadline" was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

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